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Attorneys for Plaintiffs/Counterclaim Defendants
TransPerfect Global, Inc., TransPerfect Translations
International, Inc., and Translations.com, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

TRANSPERFECT GLOBAL, INC.,
TRANSPERFECT TRANSLATIONS
INTERNATIONAL, INC., AND
TRANSLATIONS.COM, INC.,

Plaintiffs/Counterclaim
defendants,

v.

MOTIONPOINT CORPORATION,

Defendant/Counterclaim
plaintiff.

Case No. CV 10-02590 CW (JCS)

**STIPULATION AND ~~PROPOSED~~ ORDER
RE: CONTINUATION OF STAY OF FACT
DISCOVERY AND STAY OF EXPERT
PROCEEDINGS PENDING RESOLUTION
OF MOTIONPOINT'S OBJECTION TO
ORDER GRANTING TRANSPERFECT'S
MOTION FOR DISQUALIFICATION (D.I.
198)**

Judge: Hon. Claudia Wilken

STIPULATION AND ~~PROPOSED~~ ORDER RE:
CONTINUATION OF STAY

CASE NO. CV 10-02590 CW (JCS)

STIPULATION

WHEREAS, The Court has entered an Order Granting TransPerfect's Motion for Disqualification of Counsel (D.I. 198) that disqualifies McDermott Will & Emery LLP from representing MotionPoint in the above-captioned action;

WHEREAS, MotionPoint intends to lodge an objection to the Order Granting TransPerfect's Motion for Disqualification of Counsel, and, if necessary, retain replacement counsel (the search for which has already commenced) in a reasonable time frame;

THEREFORE, the parties hereby stipulate and agree to a continuation of the stay of discovery in the above-captioned matter, with said stay including expert proceedings (including expert reports and expert discovery), until the Court has adjudicated MotionPoint's objections, and, if necessary, until MotionPoint has retained new counsel for this matter. This stipulation is without prejudice to TransPerfect's ability to raise with the Court any issues regarding any delay in MotionPoint's acquisition of new counsel.

SO STIPULATED.

1 Dated: June 25, 2012

2 By: /s/ L. Okey Onyejekwe Jr.
3 L. Okey Onyejekwe, Jr.
4 Kasowitz, Benson, Torres & Friedman LLP
5 Attorneys for Plaintiffs/Counterclaim
6 Defendants TransPerfect Global, Inc.,
7 TransPerfect Translations International,
8 Inc., and Translations.com, Inc.

9 By: /s/ Adrian J. Sawyer
10 Adrian J. Sawyer
11 Kerr & Wagstaffe LLP
12 Appearing on a limited basis for
13 Defendant/Counterclaim Plaintiff
14 MotionPoint Corporation¹

15 I hereby attest pursuant to General Order 45.X.B. that concurrence in the electronic filing
16 of this document has been obtained from the other signatories.

17 /s/L. Okey Onyejekwe, Jr.
18 L. Okey Onyejekwe, Jr.

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27 ¹ In light of the Order Granting TransPerfect's Motion for Disqualification of Counsel, Kerr & Wagstaffe LLP has
28 been authorized by MotionPoint Corporation to sign this Stipulation and [Proposed] Order. Kerr & Wagstaffe LLP is
not appearing as counsel for MotionPoint in this matter.

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 6/26/2012


HON. CLAUDIA WILKEN
UNITED STATES DISTRICT COURT JUDGE